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December 23, 2009

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

**RE: Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135, A National Broadband Plan for Our Future, GN Docket No. 09-51**

Dear Ms. Dortch:

At the request of staff, AT&T submits the attached chart depicting the disparity in voice termination rates for inclusion in the record in the above proceedings. This disparity in rates continues to drive a variety of compensation arbitrage schemes. AT&T urges the Commission to act decisively to minimize regulatory arbitrage associated with the “buy low, sell high” opportunities illustrated in the chart. In the near term, the Commission should reign in the most egregious practices, notably access pumping. In the longer term, the Commission needs to complete the long-delayed, comprehensive reform that the industry so desperately needs to complete the transition to broadband networks and a broadband business model.

Please call me if you have any questions.

Sincerely,

/s/ Brian J. Benison

Attachment

cc: Rebekah Goodheart